EXHIBIT A

A.   **Electronically Stored Information ("ESI").**

ESI shall be provided in the following format:

1.   PDFs. Single PDFs shall be provided for each document. The parties shall accommodate reasonable requests for production of specific images in color. Where a party determines in good faith that producing a substantial volume of documents as PDFs would materially increase the burden and/or expense of production, the party may opt to produce as TIF/JPG.

2.   Database Load Files/Cross-Reference Files. Documents shall be provided with (1) a Concordance delimited load file(s) and (2) an Opticon delimited cross-reference file(s).

Example of Concordance Delimited File:

þBegDocþþEndDocþþBegAttachþþEndAttachþ

Example of Opticon Delimited File:

MSC000001,MSC001,D:\IMAGES\001\MSC000001.PDF,Y,,,3
MSC000004,MSC001,D:\IMAGES\001\MSC000004.PDF,Y,,,2

Example of Opticon Delimited File (for TIF/JPG):

MSC000001,MSC001,D:\IMAGES\001\MSC000001.[TIF/JPG],Y,,,3
MSC000002,MSC001,D:\IMAGES\001\MSC000002.[TIF/JPG],,,,
MSC000003,MSC001,D:\IMAGES\001\MSC000003.[TIF/JPG],,,,,
MSC000004,MSC001,D:\IMAGES\001\MSC000004.[TIF/JPG],Y,,,2
MSC000005,MSC001,D:\IMAGES\001\MSC000005.[TIF/JPG],,,,

3.   Unique IDs. Each PDF shall have a unique file name which shall be the Bates number of the first page of each document (e.g., BATES000001.PDF). For TIF/JPG, each image shall have a unique file name which shall be the Bates number of that page (e.g., BATES000001.[TIF/JPG]). A Bates number must appear on the face of each page (e.g., BATES000001).

4.   Text Files. For each document, a document-level text file shall be provided. The text of non-redacted ESI shall be extracted directly from the native file and each text file shall be named for the beginning Bates number of its corresponding document (e.g., BATES000001.TXT). OCR text files shall be provided for redacted documents. Unless the ESI is of a type not amenable to

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OCR, e.g., media files, OCR text files shall be provided for documents that do not contain extractable text in the native file.

5.   Unique Documents. The parties shall attempt to de-duplicate ESI to avoid substantially duplicative productions. No party shall remove any attachment to any email, regardless of whether the attachment is duplicative of any other document. The parties may de-duplicate emails that are identical. Custodian metadata for a given document shall reflect any Custodian of any document removed as a duplicate of that document.

6.   Metadata Fields. The following metadata shall be provided within the Concordance delimited file described above to the extent reasonably accessible and not subject to a justified and proper claim of privilege:

For all documents:

> Md5Hash
> Confidentiality (designation under Protective Order)
> Custodian(s)[1]

Additionally, for emails:

> To
> From
> CC
> BCC
> Date Sent
> Time Sent (Pacific Time Zone)
> Subject
> ProdBegAttach
> ProdEndAttach

Additionally, for non-email documents:

> Author
> Last Modified By
> Filename
> File Extension
> Created
> Last Modified Date

7.   Additional Metadata. Should additional metadata (such as the original filepath of documents) be reasonably accessible that if provided would significantly aid

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[1] Custodian metadata shall in good faith identify from whom or where each document was collected for production in this action, e.g., an individual, a document repository, or a third party. Merely identifying the producing party as the custodian generally fails to satisfy this requirement.

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a receiving party in understanding or using the documents, if requested, the producing party shall not unreasonably withhold such metadata.

8.   Native Form. The following documents shall be produced in native form: standalone database files such as Microsoft Excel or Access files; CAD or similar engineering drawings or schematics; source code or other software; complete, functional copies of websites. The parties shall not unreasonably refuse a request for the production of other documents in native form.

9.   Other Databases. Extracts from non-standalone databases, e.g., financial databases, shall be produced natively, as a text delimited file, or where possible as a Microsoft Excel or Access file.

10.   PDF Placeholder. Where documents produced natively are displaced from the production PDF images of the documents with which they are kept in the ordinary course of business, the parties shall produce a Bates-numbered PDF placeholder image, and associate the displaced native document with that Bates number.

B.   **Hard-Copy Documents.**

Hard-copy documents shall be provided in the following format:

1.   PDFs. Single PDFs shall be provided for each document. Where a party determines in good faith that producing a substantial volume of documents as PDFs would materially increase the burden and/or expense of production, the party may opt to produce as TIF/JPG.

2.   Database Load Files/Cross-Reference Files. Documents shall be provided with (1) a Concordance delimited load file(s) and (2) an Opticon delimited cross-reference file(s).

Example of Concordance Delimited File :

þBegDocþþEndDocþþBegAttachþþEndAttachþ

Example of Opticon Delimited File:

MSC000001,MSC001,D:\IMAGES\001\MSC000001.PDF,Y,,,3
MSC000004,MSC001,D:\IMAGES\001\MSC000004.PDF,Y,,,2

Example of Opticon Delimited File (for TIF/JPG):

MSC000001,MSC001,D:\IMAGES\001\MSC000001.[TIF/JPG],Y,,,3
MSC000002,MSC001,D:\IMAGES\001\MSC000002.[TIF/JPG],,,,
MSC000003,MSC001,D:\IMAGES\001\MSC000003.[TIF/JPG],,,,,
MSC000004,MSC001,D:\IMAGES\001\MSC000004.[TIF/JPG],Y,,,2
MSC000005,MSC001,D:\IMAGES\001\MSC000005.[TIF/JPG],,,,

3. Unique IDs. Each PDF shall have a unique file name which shall be the Bates number of the first page of each document (e.g., BATES000001.PDF). For TIF/JPG, each image shall have a unique file name which shall be the Bates number of that page (e.g., BATES000001.[TIF/JPG]). A Bates number must appear on the face of each page (e.g., BATES000001).

4. OCR. For each document, a document-level text file shall be provided. Each text file shall be named for the beginning Bates number of its corresponding document (e.g., BATES000001.TXT).

5. Unitizing of Documents. When scanning paper documents, the parties shall undertake reasonable efforts to ensure that distinct documents are not merged into a single record, and single documents are not split into multiple records (*i.e.*, the parties shall attempt to logically unitize scanned hard copy documents).

6. Objective Coding Fields. The following objective coding fields shall be provided to the extent reasonably available: (i) Beginning Bates Number; (ii) Ending Bates Number; (iii) Beginning Attachment Bates Number; (iv) Ending Attachment Bates Number; and (v) Custodian.[2]

C. **Production Media.** Documents shall be produced on CD/DVD discs, on portable hard drives (including thumb drives or memory sticks), or via email, FTP, or similar electronic file transfer.

D. **Objective Coding/Metadata Format.**

The objective coding and/or electronic file metadata, including extracted text, shall be provided in the following format:

    a) fields shall be delimited by the default Concordance field delimiter for ANSI character 20 ()
    b) String values within the fields file shall be enclosed with a text delimiter (þ)
    c) The first line shall contain objective coding and/or electronic file metadata headers and below the first line there shall be exactly one line for each document
    d) Each row of objective coding and/or electronic file metadata must contain the same amount of fields as the header row
    e) Multi-values shall be separated by a semicolon (;)
    f) All files containing non-Western characters shall be provided in Unicode-compliant form.

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[2] Custodian metadata shall in good faith identify from whom or where each document was collected for production in this action, e.g., an individual, a document repository, or a third party. Merely identifying the producing party as the custodian generally fails to satisfy this requirement.

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E.   **Parties to Confer in Good Faith.**

The parties agree to confer in good faith about disputes regarding the form of document production, including to resolve issues not addressed by this stipulation.

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